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August 11, 2021

**BY E-MAIL**

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*Re: United States v. Paige Thompson, CR19-0159 RSL*

Dear Counsel:

We write to respond to your letter of July 1, 2021. That letter lists certain discovery relevant to different enumerated victims and asks that we identify any additional discovery related to these entities. Unfortunately, we have the same means and ability to identify such discovery that you do – namely, by searching for victim names in our database of the discovery. Even a cursory search reveals that there is substantial additional discovery related to many of these victims. (For example, the document at USA0004496-551 contains information relating to several of the victims. The documents at USA00000677-87 and USA0001470 relate to [REDACTED]. And there no doubt is substantial information relating to these victims in the forensic evidence in the case.) For all these reasons, we are unable comprehensively to identify the additional discovery that you ask that we identify (nor do we have any obligation to do so).

Your letter also asks that we identify the files on the drives that we have provided to you that contain the data belonging to these entities. Attached to this letter is a file tree structure for your client's principal computer that shows that information. The core dataset is in the directory shown in that file tree structure. In addition, information related to some of the intrusions can be found in the [REDACTED].

Finally, you say that you would like to discuss the Protective Order and that you wish to receive a copy of all the Capital One data seized from your client's possession. We are happy to discuss the issue with you. We do note that, notwithstanding your commitment to keeping data safe, recent history suggests that nowhere is actually safe from intrusion. We have discussed the issue with Capital One, which is concerned about us creating and sharing additional copies of the victim data in the case, and thereby exposing it to potential further theft. We understand your desire to be able to access the data other than at the FBI. We believe that there probably are ways that we can satisfy your desire to review the data, but also believe that subject probably is most productively resolved by the discussion you suggest, rather than by letters back and forth.

Let us know when you would like to speak.

TESSA M. GORMAN  
Acting United States Attorney

s/ Andrew C. Friedman  
ANDREW C. FRIEDMAN  
STEVEN T. MASADA  
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Attachment